

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Erie Insurance a/s/o Sharon Eichner  
100 Frie Insurance Place, Frie, PA 16530

(b) County of Residence of First Listed Plaintiff Erie  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Douglas G. Aaron, Esquire, 215/561-7000  
1628 JFK Blvd., Ste. 810, Philadelphia, PA 19103

## DEFENDANTS

United States of America - United States Postal Service  
1425 Crooked Hill Road, Harrisburg, PA 17107

County of Residence of First Listed Defendant Dauphin  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 3 Federal Question (U.S. Government Not a Party)  
☒ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                                   |   | PTF                        | DEF                        |
|---|----------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

| CONTRACT  | TORTS   | FORFEITURE/PENALTY  | BANKRUPTCY   | OTHER STATUTES  |
|---|---|---|--|---|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input checked="" type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice<br><b>PERSONAL INJURY</b><br><input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><b>LABOR</b><br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><b>IMMIGRATION</b><br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><b>PROPERTY RIGHTS</b><br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><input type="checkbox"/> 880 Defend Trade Secrets Act of 2016<br><b>SOCIAL SECURITY</b><br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><b>FEDERAL TAX SUITS</b><br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)<br><input type="checkbox"/> 485 Telephone Consumer Protection Act<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <b>REAL PROPERTY</b><br><input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <b>CIVIL RIGHTS</b><br><input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education<br><b>PRISONER PETITIONS</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement  |   |  |   |

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Federal Tort Claims Act 28 U.S.C. 1346 et seq

Brief description of cause:

Motor vehicle accident involving a Post Office vehicle

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$  
5,100.19

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

03/22/2021

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IEP

JUDGE

MAG. JUDGE

**DESIGNATION FORM**

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 100 Erie Insurance Place, Erie, PA 16530  
Address of Defendant: 1425 Crooked Hill Road, Harrisburg, PA 17107  
Place of Accident, Incident or Transaction: S. Whitehall Township, PA

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when *Yes* is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 03/22/2021

[Signature]  
Attorney-at-Law / Pro Se Plaintiff

54058

Attorney I.D. # (if applicable)

**CIVIL: (Place a  $\checkmark$  in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability - Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, \_\_\_\_\_, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_  
[Signature]  
Attorney-at-Law / Pro Se Plaintiff

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Erie Insurance a/s/o Sharon Eichner

CIVIL ACTION

v.

United States of America - United States  
Postal Service

NO. 2:20-cv-3331

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

3/22/2021  
Date

Douglas G. Aaron, Esquire  
Attorney-at-law

Plaintiff

215/561-7000

215/665-8845

doug@aaronandprince.com

Telephone

FAX Number

E-Mail Address

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                     |   |              |
|-------------------------------------|---|--------------|
| <b>ERIE INSURANCE</b>               | : |              |
| <b>A/S/O SHARON EICHNER</b>         | : |              |
| 100 Erie Insurance Place            | : |              |
| Erie, PA 16530                      | : | CIVIL ACTION |
|                                     | : |              |
| vs.                                 | : |              |
| <b>UNITED STATES OF AMERICA-</b>    | : | NO.          |
| <b>UNITED STATES POSTAL SERVICE</b> | : |              |
| 1425 Crooked Hill Road              | : |              |
| <u>Harrisburg, PA 17107</u>         | : |              |

**COMPLAINT IN CIVIL ACTION**

1. Plaintiff, Erie Insurance ("Erie") is an insurance carrier licensed to conduct business in the Commonwealth of Pennsylvania, with a place of business located at 100 Erie Insurance Place, Erie, PA 16530..

2. Defendant, United States Postal Service ("USPS") is an agency of the United States of America and at all times relevant hereto, by and through their employees, agents or servants, owned, operated and controlled a motor vehicle which was involved in the accident described below.

3. At all times hereinafter mentioned, Kerry McGuire, was an employee, servant and/or agent of the defendant, USPS, and was acting within the scope and authority of her employment with the defendant, USPS.

4. On or about December 20, 2019, plaintiff insured a motor vehicle owned by its insured, Sharon Eichner, which was lawfully being operated at Americus Drive and Mosser Drive in S. Whitehall Township, Pennsylvania, when a motor vehicle owned by



defendant, USPS, and negligently and carelessly operated by its employee, McGuire, caused a motor vehicle accident, causing plaintiff's insured to sustain property damages and other out of pocket expenses more particularly hereinafter set forth.

5. The aforesaid collision was caused solely as a result of the defendant's negligence and carelessness in that the defendant, by and through its employee:

- a. failed to maintain a proper lookout;
- b. failed to yield the right of way;
- c. failed to keep an assured clear distance;
- d. failed to obey the rules of the road;
- e. failed to operate the vehicle at a reasonable rate of speed under the circumstances;
- f. failed to properly apply the brakes;
- g. failed to properly apply the parking brake before exiting the vehicle;
- h. negligently entrusted their vehicle to an individual who they knew, or should have known, was incompetent to operate said vehicle; and
- i. failed to maintain control of the vehicle at all times material hereto.

6. Solely as a result of the defendants' negligence and carelessness, plaintiff's insured's vehicle suffered damage in the amount of \$5,100.19 for which plaintiff was obligated to pay pursuant to its insurance contract and for which plaintiff is hereby subrogating against the defendants herein, jointly and severally. An itemization of the damage is attached hereto as Exhibit "A".

7. Upon information and belief, the matter was submitted for administrative review on or about November 9, 2020 but the USPS has failed and refused to pay the claim.

8. The Federal District Court has accordingly obtained jurisdiction of the matter.

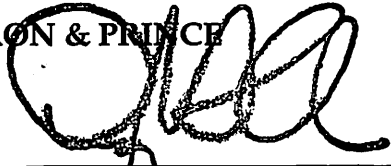
9. A claim is hereby being made pursuant to the Federal Tort Claims Act, 28 U.S.C. 1346, et.seq.

10. Venue is properly within the district under 28 U.S.C. section 1402(b), as the acts complained of occurred in the Eastern District of Pennsylvania.

**WHEREFORE**, plaintiff demands judgment of the defendants herein jointly and severally in the amount of \$5,100.19 together with interest, costs and fees.

AARON & PRINCE

BY:




---

DOUGLAS G. AARON, ESQUIRE  
Attorney I.D. No. 54058  
1628 John F. Kennedy Blvd, Ste 810  
Philadelphia, PA 19103  
(215) 561-7000  
Attorney for Plaintiff

**Date:** March 22, 2021

**VERIFICATION**

I, **DOUGLAS G. AARON, ESQUIRE**, declare under penalty of perjury that the foregoing is true and correct. Executed on March 22, 2021.



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**DOUGLAS G. AARON, ESQUIRE**  
**Attorney for Plaintiff**

**EXHIBIT "A"**



**BENNETT COLLISION CENTER**

Full Collision Service Specializing with Toyota,  
 Infiniti, Jaguar, Land Rover and Maserati  
 1951 LEHIGH ST, ALLENTOWN, PA 18103  
 Phone: (610) 437-2678  
 FAX: (610) 437-7855

Workfile ID: e04ce82a  
 PartsShare: 5GPTXC  
 Federal ID: 45-0581443

**Preliminary Supplement 2 with Summary****RO Number: 504686**

Written By: Kirk Clements, 605779  
 Adjuster: HALL, RAMONA, (570) 645-2006 Business

|                  |                              |               |                     |                 |                |
|------------------|------------------------------|---------------|---------------------|-----------------|----------------|
| Insured:         | EICHNER, SHARON              | Policy #:     | Q080908323          | Claim #:        | A00002341019-1 |
| Type of Loss:    | Collision                    | Date of Loss: | 12/20/2019 11:53 AM | Days to Repair: | 0              |
| Point of Impact: | 03 Right T-Bone (Right Side) |               |                     |                 |                |

|                      |                             |                           |
|----------------------|-----------------------------|---------------------------|
| <b>Owner:</b>        | <b>Inspection Location:</b> | <b>Insurance Company:</b> |
| EICHNER, SHARON      | BENNETT COLLISION CENTER    | ERIE INSURANCE GROUP      |
| 4235 CAROLYN DR      | 1951 LEHIGH ST              | ALLENTOWN                 |
| SLATINGTON, PA 18080 | ALLENTOWN, PA 18103         | BETHLEHEM                 |
|                      | Repair Facility             |                           |
|                      | (610) 437-2678 Day          |                           |

**VEHICLE**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

|          |                   |                  |      |              |           |              |              |
|----------|-------------------|------------------|------|--------------|-----------|--------------|--------------|
| VIN:     | JTMRFREVXHJ123650 | Interior Color:  |      | Mileage In:  | 12,271    | Vehicle Out: | 2/6/2020     |
| License: | GMK 4645          | Exterior Color:  | BLUE | Mileage Out: |           | Job #:       | Keith/Bernie |
| State:   | PA                | Production Date: |      | Condition:   | Excellent |              |              |

**TRANSMISSION**

Automatic Transmission  
 4 Wheel Drive

**POWER**

Power Steering  
 Power Brakes  
 Power Windows  
 Power Locks  
 Power Mirrors  
 Heated Mirrors

**DECOR**

Dual Mirrors  
 Privacy Glass  
 Console/Storage  
 Overhead Console

**CONVENIENCE**

Air Conditioning

Intermittent Wipers

Tilt Wheel

Cruise Control

Rear Defogger

Keyless Entry

Message Center

Steering Wheel Touch Controls

Rear Window Wiper

Telescopic Wheel

Climate Control

Navigation System

Backup Camera

Intelligent Cruise

**RADIO**

AM Radio

FM Radio

Stereo

Search/Seek

CD Player

Auxiliary Audio Connection

Satellite Radio

**SAFETY**

Drivers Side Air Bag

Passenger Air Bag

Anti-Lock Brakes (4)

4 Wheel Disc Brakes

Traction Control

Stability Control

Front Side Impact Air Bags

Head/Curtain Air Bags

Hands Free Device

Blind Spot Detection

Lane Departure Warning

**ROOF**

Luggage/Roof Rack

Electric Glass Sunroof

**SEATS**

Cloth Seats

Bucket Seats

Reclining/Lounge Seats

**WHEELS**

Aluminum/Alloy Wheels

**PAINT**

Clear Coat Paint

**OTHER**

Fog Lamps

Rear Spoiler

Signal Integrated Mirrors

California Emissions

**TRUCK**

Power Trunk/Gate Release

Get live updates at [www.carwise.com/e/3JdnVU](http://www.carwise.com/e/3JdnVU)

**Preliminary Supplement 2 with Summary****RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

| Line | Oper | Description   | Part Number | Qty | Extended Price \$ | Labor      | Paint |
|------|------|---|-------------|-----|-------------------|------------|-------|
| 1    |      | <b>FRONT DOOR</b>   |             |     |                   |            |       |
| 2    |      | Repl RT Door shell Japan built (HSS)                      | 6700142140  | 1   | 821.80            | 4.8        | 3.0   |
| 3    | S01  | Add for Clear Coat  |             |     |                   |            | 1.2   |
| 4    |      | Repl RT Black out tape                                    | 759210R030  | 1   | 27.44             | Incl.      |       |
| 5    |      | Repl RT Applique  | 757550R010  | 1   | 36.12             | Incl.      |       |
| 6    |      | Repl RT Lower molding Japan built all                     | 7507342021  | 1   | 308.15            | Incl.      |       |
| 7    | S01  | Repl RT Water shield Canada built                         | 678310R041  | 1   | 21.35             | Incl.      |       |
| 8    | S01  | Repl RT Corner trim                                       | 676630R010  | 1   | 3.30              |            |       |
| 9    | S01  | Repl RT Crash pad   | 67923-42010 | 1   | 36.23             |            |       |
| 10   | #    | S01 Duplicate OEM seam sealer                             |             | 1   | 30.00             | 1.0        |       |
| 11   | S01  | R&I RT Striker Japan built                                |             |     |                   | 0.2        |       |
| 12   |      | <b>FENDER</b>   |             |     |                   |            |       |
| 13   | S02  | Blnd RT Fender Japan built                                |             |     |                   |            | 0.9   |
| 14   |      | R&I RT Fender liner Japan built                           |             |     |                   | 0.4        |       |
| 15   |      | R&I RT Corner molding Japan built                         |             |     |                   | 0.1        |       |
| 16   | S01  | R&I RT Wheel opng mldg Japan Built w/o 2 tone             |             |     |                   | 0.3        |       |
| 17   |      | <b>FRONT LAMPS</b>  |             |     |                   |            |       |
| 18   |      | R&I RT R&I headlamp assy                                  |             |     |                   | 0.2        |       |
| 19   | S01  | Repl Alm headlamps  |             | 1   |                   | 0.5        |       |
| 20   |      | <b>FRONT BUMPER &amp; GRILLE</b>                          |             |     |                   |            |       |
| 21   |      | R&I R&I bumper cover                                      |             |     |                   | 1.2        |       |
| 22   |      | <b>REAR DOOR</b>  |             |     |                   |            |       |
| 23   | *    | S01 Rpr RT Outer panel (HSS)                              |             |     |                   | <u>5.5</u> | 2.0   |
| 24   |      | Overlap Major Adj. Panel                                  |             |     |                   |            | -0.4  |
| 25   | S01  | Add for Clear Coat  |             |     |                   |            | 0.3   |
| 26   |      | Repl RT Lower molding Japan built all                     | 750770R040  | 1   | 221.50            | 0.3        |       |
| 27   |      | R&I RT Handle, outside Japan built blue metallic          |             |     |                   | 0.3        |       |
| 28   |      | R&I RT R&I trim panel                                     |             |     |                   | 0.4        |       |
| 29   | S01  | Repl RT Water shield                                      | 678410R051  | 1   | 17.18             | 0.1        |       |
| 30   | S01  | Repl RT Belt molding                                      | 757300R030  | 1   | 88.21             | 0.2        |       |
| 31   | #    | S01 Repl SPEAKER RIVETS                                   | 90269-05034 | 3   | 5.85              |            |       |
| 32   | S01  | R&I RT R&I door assy                                      |             |     |                   | 0.9        |       |
| 33   |      | <b>PILLARS, ROCKER &amp; FLOOR</b>                        |             |     |                   |            |       |
| 34   | *    | S01 Rpr RT Ctr plr & rocker                               |             |     |                   | <u>3.0</u> | 2.2   |
| 35   | S01  | R&I RT Front sill plate                                   |             |     |                   | 0.1        |       |
| 36   | S01  | R&I RT Rear sill plate w/o hybrid                         |             |     |                   | 0.1        |       |
| 37   | S01  | R&I RT Surround w/strip front door                        |             |     |                   | 0.4        |       |
| 38   | S01  | R&I RT Surround w/strip rear door, Japan built w/o hybrid |             |     |                   | 0.4        |       |
| 39   | S01  | R&I RT Lwr ctr plr trim Japan built                       |             |     |                   | 0.2        |       |
| 40   | S01  | R&I RT Uptr ctr plr trim Japan built                      |             |     |                   | 0.2        |       |

**Preliminary Supplement 2 with Summary****RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

|                  |                            |     |      |   |            |   |                 |             |
|------------------|----------------------------|-----|------|---|------------|---|-----------------|-------------|
|                  |                            |     | gray |   |            |   |                 |             |
| 41               | <b>QUARTER PANEL</b>       |     |      |   |            |   |                 |             |
| 42               |                            | S02 | Blnd | RT Quarter panel                          |            |   |                 | 1.3         |
| 43               |                            |     | Repl | RT Wheel opng midg Japan Built all        | 756050R060 | 1 | 134.04          | 0.4         |
| 44               | *                          |     | Repl | RT Mud guard rear                         | NOT LISTED | 1 | <u>46.37</u>    | 0.2         |
| 45               | *                          |     | R&I  | RT Wheelhouse liner                       |            |   |                 | 0.3         |
| 46               |                            |     | R&I  | RT Front plate                            |            |   |                 | Ind.        |
| 47               |                            | S01 | R&I  | RT Quarter glass Toyota Japan built       |            |   |                 | 2.2         |
| 48               | #                          | S01 | Repl | URETHANE KIT                              |            | 1 | 15.00           |             |
| 49               | <b>REAR LAMPS</b>          |     |      |   |            |   |                 |             |
| 50               |                            |     | R&I  | RT Tail lamp                              |            |   |                 | 0.3         |
| 51               | <b>REAR BUMPER</b>         |     |      |   |            |   |                 |             |
| 52               |                            |     | Repl | RT Extension w/o foot sensor              | 521610R020 | 1 | 26.86           | 0.2         |
| 53               |                            |     | R&I  | R&I bumper cover                          |            |   |                 | 1.0         |
| 54               | <b>INFORMATION LABELS</b>  |     |      |   |            |   |                 |             |
| 55               |                            | S01 | Repl | RT Air bag label side air bag Japan built | 7459678010 | 1 | 3.28            | 0.2         |
| 56               | <b>VEHICLE DIAGNOSTICS</b> |     |      |   |            |   |                 |             |
| 57               | *                          |     | Repl | Post-repair scan                          |            | 1 | <u>100.00</u>   | m           |
| 58               | *                          |     | Repl | Pre-repair scan                           |            | 1 | <u>100.00</u>   | m           |
| 59               | #                          |     |      | Hazardous Waste                           |            | 1 | 5.00            | X           |
| 60               | #                          |     |      | Flex Agent                                |            | 1 | 12.00           | T           |
| 61               | #                          |     |      | Cover Car                                 |            | 1 | 10.00           | T 0.2       |
| 62               | #                          |     |      | Restore Corrosion Protection              |            | 1 | 10.00           | T 0.1       |
| 63               | #                          |     |      | Clean & Detail For Delivery               |            | 1 | 10.00           | T           |
| 64               | <b>ROOF</b>                |     |      |   |            |   |                 |             |
| 65               |                            | S01 | Blnd | RT Roof rail                              |            |   |                 | 1.0         |
| 66               |                            | S01 | R&I  | RT Drip molding front                     |            |   |                 | 0.3         |
| 67               |                            | S01 | R&I  | RT Drip molding center Japan built        |            |   |                 | 0.3         |
| 68               |                            | S01 | R&I  | RT Drip molding rear                      |            |   |                 | 0.1         |
| 69               |                            | S01 | R&I  | RT Luggage rack                           |            |   |                 | 0.4         |
| 70               | <b>LIFT GATE</b>           |     |      |   |            |   |                 |             |
| 71               |                            | S01 | R&I  | Rear spoiler Japan built gray             |            |   |                 | 0.5         |
| 72               | #                          | S01 | Refn | Tint Color (2 stage)                      |            |   |                 | 0.5         |
| 73               | #                          | S01 |      | Cover Vehicle for Primer                  |            | 1 | 10.00           | 0.3         |
| 74               | #                          | S01 | Refn | Color Sand and Buff                       |            |   |                 | 1.0         |
| 75               | #                          | S01 |      | Rustproofing / cavity wax                 |            | 1 | 10.00           | 0.3         |
| 76               | #                          | S01 |      | Clean and Re-Tape Molding                 |            | 1 | 10.00           | 0.4         |
| 77               | #                          | S01 |      | Adhesive removal                          |            | 1 |                 | 0.3         |
| 78               | #                          | S01 |      | Mask/Rope windshield for paint            |            | 1 |                 | 0.5         |
| 79               | #                          | S01 |      | BACK TAPE JAMBS PER PNL                   |            | 2 |                 | 0.4         |
| <b>SUBTOTALS</b> |                            |     |      |   |            |   | <b>2,119.68</b> | <b>29.7</b> |
|                  |                            |     |      |   |            |   |                 | <b>13.0</b> |

**Preliminary Supplement 2 with Summary****RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

**ESTIMATE TOTALS**

| <b>Category</b>      | <b>Basis</b>  | <b>Rate</b>  | <b>Cost \$</b>  |
|----------------------|---------------|--------------|-----------------|
| Parts                |               |              | 2,072.68        |
| Body Labor           | 29.7 hrs @    | \$ 53.00 /hr | 1,574.10        |
| Paint Labor          | 13.0 hrs @    | \$ 53.00 /hr | 689.00          |
| Paint Supplies       | 13.0 hrs @    | \$ 33.00 /hr | 429.00          |
| Miscellaneous        |               |              | 47.00           |
| Subtotal             |               |              | 4,811.78        |
| Sales Tax            | \$ 4,806.78 @ | 6.0000 %     | 288.41          |
| <b>Grand Total</b>   |               |              | <b>5,100.19</b> |
| Deductible           |               |              | 500.00          |
| <b>CUSTOMER PAY</b>  |               |              | <b>500.00</b>   |
| <b>INSURANCE PAY</b> |               |              | <b>4,600.19</b> |

**Preliminary Supplement 2 with Summary****RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

**SUPPLEMENT SUMMARY**

| Line                 | Oper | Description                | Part Number | Qty | Extended Price \$ | Labor      | Paint      |
|----------------------|------|----------------------------|-------------|-----|-------------------|------------|------------|
| <b>Deleted Items</b> |      |                            |             |     |                   |            |            |
| 13                   | *    | Blnd RT Fender Japan built |             |     |                   |            | 0.0        |
| 42                   | *    | Blnd RT Quarter panel      |             |     |                   |            | 0.0        |
| <b>Added Items</b>   |      |                            |             |     |                   |            |            |
| 13                   | S02  | Blnd RT Fender Japan built |             |     |                   |            | 0.9        |
| 42                   | S02  | Blnd RT Quarter panel      |             |     |                   |            | 1.3        |
| <b>SUBTOTALS</b>     |      |                            |             |     | <b>0.00</b>       | <b>0.0</b> | <b>2.2</b> |

**TOTALS SUMMARY**

| Category                       | Basis       | Rate         | Cost \$       |
|--------------------------------|-------------|--------------|---------------|
| Parts                          |             |              | 0.00          |
| Paint Labor                    | 2.2 hrs @   | \$ 53.00 /hr | 116.60        |
| Paint Supplies                 | 2.2 hrs @   | \$ 33.00 /hr | 72.60         |
| Subtotal                       |             |              | 189.20        |
| Sales Tax                      | \$ 189.20 @ | 6.0000 %     | 11.35         |
| Additional Supplement Taxes    |             |              | 0.01          |
| <b>Total Supplement Amount</b> |             |              | <b>200.56</b> |
| <b>NET COST OF SUPPLEMENT</b>  |             |              | <b>200.56</b> |

**CUMULATIVE EFFECTS OF SUPPLEMENT(S)**

|                   |                    |               |
|-------------------|--------------------|---------------|
| Estimate          | 3,248.79           | RAMONA HALL   |
| Supplement S01    | 1,650.84           | Kirk Clements |
| Supplement S02    | 200.56             | Kirk Clements |
| <b>Job Total:</b> | <b>\$ 5,100.19</b> |               |

**Preliminary Supplement 2 with Summary**

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**RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

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Thank you for taking time to allow us to provide an estimate for you. This estimate is based on our VISUAL inspection and does not cover parts and/or labor which may have been hidden and be required after the work has been started. After the vehicle has been disassembled, worn or damaged parts which are not evident upon first inspection may be discovered. Naturally, this estimate cannot cover such contingencies.

Our process is to disassemble the damaged vehicle and identify all the repairs required to repair your vehicle. Once that step of the repair process is completed, we will contact your insurance company for a supplemental reinspection. After the supplemental reinspection has taken place, the actual time frame of repair can be established to estimate an approximate GOAL for completion date.

The GOAL for completion date is an estimated time frame based on the estimated repairs. Sometimes unforeseen repair requirements, such as parts required to make wheel alignment specifications, excess volume due to weather related issues, parts back order delays, etc., may force a repair to take longer than the GOAL for completion date. Part prices are subject to invoice and can change without notice.

Payment in FULL is required for all repairs and/or services rendered BEFORE we can release your vehicle, unless prior arrangements have been made.

We provide a LIMITED LIFETIME WARRANTY to you as long as you own the vehicle and we will honor any insurance company estimate presented to us. This estimate has been prepared for your immediate acceptance.

Thank you,  
Jay Cassel  
Bennett Collision Center Manager  
Phone# 610-437-2678

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If going through any insurance company , please remember YOU and only You can make the choice of the repair facility to repair your vehicle. Make sure the facility has OEM trained technicians and is working for YOUR best interest NOT the insurance company. Any questions or help with this process please call our collision center we are her to help you the customer. Thank you!

THIS IS NOT AN AUTHORIZATION TO REPAIR. The vehicle owner must authorize all repairs. Erie Insurance reserves the right to reinspect all supplements before payment is made. Costs above the appraisal amount may be the responsibility of the vehicle owner. There is NO requirement to use any specified repair shop. Information regarding repair facilities which will be able to repair the vehicle for the appraised amount may be available from Erie Insurance upon request.



**Preliminary Supplement 2 with Summary**

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**RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

ANY PERSON WHO KNOWINGLY AND WITH INTENT TO DEFRAUD ANY INSURANCE COMPANY OR OTHER PERSON FILES AN APPLICATION FOR INSURANCE OR STATEMENT OF CLAIM CONTAINING ANY MATERIALLY FALSE INFORMATION OR CONCEALS FOR THE PURPOSE OF MISLEADING, INFORMATION CONCERNING ANY FACT MATERIAL THERETO COMMITS A FRAUDULENT INSURANCE ACT, WHICH IS A CRIME AND SUBJECTS THE PERSON TO CRIMINAL AND CIVIL PENALTIES.

THE FOLLOWING IS A LIST OF ABBREVIATIONS OR SYMBOLS THAT MAY BE USED TO DESCRIBE WORK TO BE DONE OR PARTS TO BE REPAIRED OR REPLACED: D=DISCONTINUED PART A=APPROXIMATE PRICE B=BODY LABOR D=DIAGNOSTIC E=ELECTRICAL F=FRAME G=GLASS M=MECHANICAL P=PAINT LABOR S=STRUCTURAL T=TAXED MISCELLANEOUS X=NON TAXED MISCELLANEOUS ADJ=ADJACENT ALGN=ALIGN A/M=AFTERMARKET BLND=BLEND CAPA=CERTIFIED AUTOMOTIVE PARTS ASSOCIATION D&R=DISCONNECT AND RECONNECT EST=ESTIMATE EXT. PRICE=UNIT PRICE MULTIPLIED BY THE QUANTITY INCL=INCLUDED MISC=MISCELLANEOUS NON-ADJ=NON ADJACENT O/H=OVERHAUL OP=OPERATION NO=LINE NUMBER QTY=QUANTITY RECOND=RECONDITION REFN=REFINISH REPL=REPLACE R&I=REMOVE AND INSTALL R&R=REMOVE AND REPLACE RPR=REPAIR RT=RIGHT SECT=SECTION SUBL=SUBLET LT=LEFT W/O=WITHOUT W/\_=WITH/\_ #=MANUAL LINE ENTRY \*=OTHER [IE..MOTORS DATABASE INFORMATION WAS CHANGED]. \*\*=DATABASE LINE WITH AFTERMARKET N=NOTES ATTACHED TO LINE NAGS=NATIONAL AUTO GLASS SPECIFICATIONS. OPT OEM=ORIGINAL EQUIPMENT MANUFACTURER PARTS EITHER OPTIONALLY SOURCED OR OTHERWISE PROVIDED WITH SOME UNIQUE PRICING OR DISCOUNT.

THE ATTACHED ESTIMATE REPRESENTS AN APPRAISAL OF THE COST OF REPAIR FOR THE VISIBLE DAMAGE TO THE VEHICLE NOTED AT THE TIME OF INSPECTION NECESSARY TO RETURN THE VEHICLE TO ITS PREDAMAGED CONDITION. COSTS ABOVE THE APPRAISED AMOUNT MAY BE THE RESPONSIBILITY OF THE VEHICLE OWNER. THERE IS NO REQUIREMENT THAT THE VEHICLE OWNER USE ANY SPECIFIED REPAIR SHOP. INFORMATION REGARDING REPAIR FACILITIES WHICH WILL BE ABLE TO REPAIR THE VEHICLE FOR THE APPRAISED AMOUNT IS AVAILABLE FROM THE INSURANCE COMPANY. IF USED PARTS ARE SPECIFIED, THEY ARE REQUIRED TO BE OF LIKE KIND AND QUALITY TO THOSE BEING REPLACED. INCIDENTAL CHARGES SUCH AS TOWING, PROTECTIVE CARE, CUSTODY, STORAGE, DEPRECIATION, BATTERY AND TIRE REPLACEMENT ARE NOTED WHEN APPLICABLE.

**Preliminary Supplement 2 with Summary****RO Number: 504686**

2017 TOYO RAV4 XLE AWD 4D UTV 4-2.5L Gasoline Sequential MPI BLUE

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide ARM8451, CCC Data Date 02/03/2020, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships with discounted pricing. Asterisk (\*) or Double Asterisk (\*\*) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2020 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

**SYMBOLS FOLLOWING PART PRICE:**

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category. X=Miscellaneous Non-Taxed charge category.

**SYMBOLS FOLLOWING LABOR:**

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

**OTHER SYMBOLS AND ABBREVIATIONS:**

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel. CAPA=Certified Automotive Parts Association. D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

CCC ONE Estimating - A product of CCC Information Services Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.